IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA ANDERSON DIVISION

IN RE: LANDAMERICA 1031 EXCHANGE) SERVICES, INC. INTERNAL REVENUE)	
SERVICES, INC. INTERNAL REVENUE SERVICE § 1031 TAX DEFERRED)	MDL No. 2054
EXCHANGE LITIGATION)	MDE 110. 2004
Angela M. Arthur, as Trustee of the Arthur)	
Declaration of Trust, dated December 29, 1988;)	
Vivian R. Hays, an individual; Leapin Eagle,)	Southern District of California
LLC, a limited liability company; Denise J.	C.A. No. 3:09-cv-00054
Wilson, an individual; Gerald R. Terry, an	
individual, Ann T. Robbins, an individual; and)	
Jane T. Evans, an individual; on their own	District of South Carolina
behalf and on behalf of a class of others) similarly situated,	C.A. No.: 8:09-cv-00415
Plaintiffs,)	
v.)	
SunTrust Bank; Theodore L. Chandler, Jr.;	
G. William Evans; Stephen Connor; Ronald B.)	
Ramos; Devon M. Jones; and Brenton J. Allen,	
Defendants.)	

NOTICE OF MOTION AND MOTION FOR ORDER APPROVING CERTIFICATION OF A RULE 23(b)(3) SETTLEMENT CLASS, FOR APPOINTMENT OF CLASS COUNSEL, FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT, AND FOR APPROVAL OF FORM AND MANNER OF NOTICE TO THE CLASS

PLEASE TAKE NOTICE that plaintiffs do hereby move for approval of a Rule 23(b)(3) settlement class; for appointment of Class Representatives and Class Counsel; for preliminary approval of the class settlement of the above-captioned action; and for approval of form and manner of notice to the class. This Motion is made and based on Plaintiffs' Memorandum in

Support of this Motion, the parties' Settlement Agreement dated June 14, 2012, attached as Exhibit A; the proposed form of Notice to the Class attached as Exhibit B; the global mediation Term Sheet attached as Exhibit C; the Order of the Bankruptcy Court granting Relief from the Channeling Injunction, attached as Exhibit D; the Declaration of Cheryl F. Perkins; all other pleadings and matters of record herein; and such other and additional matters as this Court may properly consider.

Respectfully submitted,

s/Cheryl F. Perkins

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Columbia, South Carolina

June 27, 2012